

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Broadcast Localism)	MB Docket No. 04-233
)	
)	

To: Office of the Secretary
Attn: The Commission

COMMENTS

Bond Broadcasting owner John Kennedy, the licensee of WGEL Greenville, pursuant to *Report on Broadcast Localism and Notice of Proposed Rulemaking*, FCC 08-218, MB Docket No. 04-233, released January 24, 2008, hereby submits its comments in this proceeding regarding the FCC's several proposed rule changes designed to enhance broadcast localism and diversity, to increase and improve the amount and nature of broadcast programming that is targeted to the local needs and interests of a broadcast station's community of service, and to provide more accessible information to the public about broadcasters' efforts to air such programming.¹

Comments on Localism proposals:

Main Studio Rule: Although our station is located in its Community of License I don't feel it is a necessity in today's mobile society. Today people live in one

¹ By *Public Notice*, DA 08-515, released March 6, 2008, time for filing comments in this proceeding was extended to April 28, 2008. Accordingly, these comments are timely filed.

community, work in another and as school districts consolidate their children may attend school in a different community altogether. Our radio station provides coverage not only to our city of license but also to surrounding communities that have no licensed broadcast facilities. People from cities in our coverage area have access to our station via US Mail, telephone, fax, or email. With cell phones listeners have more ways to contact us than ever before. While I agree there are practical ways to improve localism, reverting to the pre-1987 main studio rule would be unnecessarily burdensome to many small market broadcasters. I agree that "localism" is the key to my business. WGEL's goal is to always serve our communities. If we do not, local businesses do not want to do business with us and that is our only source of revenue. Localism is the key to our survival.

Improving Delivery of Emergency Information: alternative solutions to 24/7 staffing.

If the issue is timely delivery of emergency information to the public please consider these alternatives to mandated 24 hour staffing.

Emergencies are best handled on air by managers and news professionals who can be reached at home or via cell phone and who can access programming via technology. Technology allows reliable access to radio stations from a remote location. The EAS system automatically takes over stations immediately and broadcast alerts. This happens "manned or unmanned" Running unattended overnight has allowed WGEL to use recourses to better serve our communities on a consistent daily basis. The technology and expertise exist and if we have the flexibility to utilize it, we can and have accomplished the delivery of emergency information. April 18th 2008 at 5:37AM a 5.2 earthquake hit our area I personally was broadcasting emergency information within 5 minutes of the tremor.

Stations could be given the option of certifying they have an emergency action plan assuring emergency information can be broadcast within a reasonable period of time, regardless of the location of the individual charged with the responsibility of airing such information. Stations should be required to devise and establish along with local emergency officials, written plans to allow officials to contact station management and that management to have the ability to interrupt programming from any location.

Advisory Boards:

I understand the FCC wants to be sure stations have adequate opportunity to hear from the community. Here's how we ascertain community needs. I personally cover for our local news monthly Greenville City Council meetings, Planning Commission meetings, and Zoning meetings. Our news people cover City Council meetings from Smithboro, Keyesport, Pocahontas and Highland Illinois. Plus School board meetings, County board meetings, Health department meetings, and Park district meetings. I am a member and past president of the Greenville Chamber of Commerce, the Greenville Lions Club, and the Greenville Commercial Club. I'm a member of the Greenville business and Professional Association, the VFW, American Legion and AMVETS, the Greenville Regional hospital auxiliary, and St. Lawrence Catholic Church. I serve on the community board for Greenville College and the Federal Correctional Institution Greenville. I would again ask the Commission to allow stations to implement plans to accomplish community ascertainment based on their communities not mine and not Washington D.C.'s. Again Localism and knowledge of our Communities are our only chance of being relevant and ultimately determines our ability to survive today more then ever considering the multitude of media choices available to the people we serve.

In conclusion, Bond Broadcasting, submits that the above comments should be taken into consideration by the Commission in issuing its decision in the above-referenced proceeding.

Respectfully submitted,

04/25/2008

By John Kennedy

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04/25/2008

